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DATE FILED: 9/18/13

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE LOWER MANHATTAN DISASTER SITE
LITIGATION

THIS DOCUMENT APPLIES TO ALL LOWER
MANHATTAN DISASTER SITE LITIGATION

CASE No.: 21MC102(AKH)

Stipulation of Discontinuance
As to the Defendant, Tribeca
Pointe LLC s/h/s/ Tribeca
Landing LLC, only

SEE ATTACHED "EXHIBIT A"

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned for the parties in the cases listed in the attached Exhibit A, that whereas no party is an infant, incompetent person for whom a committee has been appointed or a conservatee, and no person not a party has an interest in the subject matter of this action and based on the representation of the within defendant, and to the extent the Plaintiff(s) can so stipulate that each claim, cross-claim and counter-claim asserted by and against the Defendant TRIBECA POINTE LLC s/h/s/ TRIBECA LANDING LLC, only as to the claims being made as to the premises located at 345 Chambers Street, New York, New York and for the cases listed in the attached Exhibit A, shall be and the same are hereby discontinued without prejudice and without costs to any party as against the other.

IT IS HEREBY STIPULATED AND AGREED, that should evidence be discovered throughout the course of the litigation which determines that TRIBECA POINTE LLC s/h/s/ TRIBECA LANDING LLC are proper parties to this suit, the Plaintiff(s) may reinstate the action, without regard to the applicable Statute of Limitations, assuming said original action was timely commenced, and in such instance Defendant shall not assert a Statute of Limitations as a defense.

This Stipulation may be filed without further notice with the Clerk of the Court.

Dated: New York, New York

~~June 25, 2013~~

September 17,

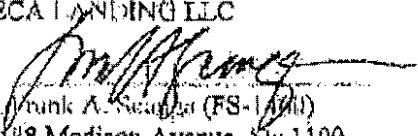
LAW OFFICE OF FRANK A. SCANGA

Attorney for Defendant

TRIBECA POINTE LLC s/b/a

TRIBECA LANDING LLC


By:


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GREGORY J. CANNATA & ASSOCIATES

Attorneys for Plaintiff(s)

By:


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SO ORDERED:

9/18/13

Hon. Alvin K. Hellerstein

Schedule A

Grochow Earned Tribune Points Cases

Plaintiff Name	Defendant Name	Case Number	Case Number
Acosta	Ruben	06cv05385	05cv08499
Akulov	Vladimir	06cv5335	
Balguz	Aleksandar	06CV5338	06cv02528
Ciborowski	Henryk	10cv4226	
Dobrowolski	Jan	10cv6859	
Foremska	Lucyna	05cv3080	
Kucharski	Zbigniew	08cv9069	
Perzynska	Irena	06cv5345	
Ratajski	Marian	10cv6868	
Wozniakowski	Dariusz	06cv5344	
Zalewski	Boguslaw	06cv01524	06cv01525